

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE ER REGULATORY CONTACT RECORD

Date/Time: April 28, 2005 / 10:00 a.m.

Site Contact(s): K-H: Karen Wiemelt, Susan Serreze

Phone: 303-692-2035 – CDPHE
303/312-6312 - EPA
303/966-4226 – DOE

Agency: CDPHE: Harlen Ainscough, Dave Kruchek, Carl Spreng
EPA: Larry Kimmel
DOE: Norma Castañeda

Purpose of Contact: A meeting was held on April 28 2005 to discuss IHSS Group IHSS NE-1, B-Ponds Closeout Report, the 2005 HRR, and the Offsite HRR Area Write up.

Discussion: See meeting minutes below.

Contact Record Prepared By: Susan Serreze

April 28, 2005 Comment Resolution Meetings For IHSS NE-1, B-Ponds Closeout Report 2005 HRR Offsite HRR Area Write up

A meeting was held on April 28 2005 to discuss IHSS Group IHSS NE-1, B-Ponds Closeout Report, the 2005 HRR, and the Offsite HRR Area Write up.

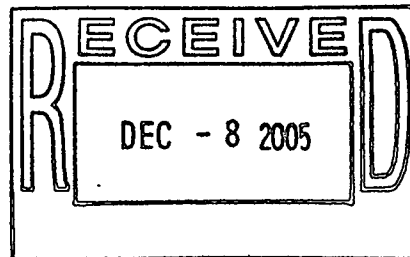
Attendees

DOE: Norma Castaneda
CDPHE: Harlen Ainscough, David Kruchek, Carl Spreng
EPA: Larry Kimmel, Dirk Applegate (Greystone)
K-H Team: Karen Wiemelt, Carla Rellegert, Susan Serreze

Report Status

The Metals White Paper was handed out.

Issues



ADMIN RECORD

OU06-A-000613

No Sitewide issues were discussed.

Specific Comments

IHSS Group NE-1, B-Ponds

The attached written comments were received from EPA and CDPHE. The following resolutions were agreed to:

The B-Ponds Closeout Report was discussed. The following resolutions were agreed to:

- Text will be added to the SSRS indicating that contaminant concentrations are very low.
- Text will be added that indicates long term monitoring will continue.

All other comments will be addressed.

2005 HRR

Text will be added to the introduction indicating why some IHSSs are in IHSS Groups.(Susan to check)

Offsite Area Write Up

The attached written comments were received from CDPHE. The following resolutions were agreed to:

- The data from the offsite IHSSs will not be compared to WRW ALs.
- No additional information regarding SEP contamination will be added to this write up.
- Information on the B-Ponds remediation will be added.
- Will add information on the pathways used in the OU 3 investigation.

Based on additional discussion the type of data used for IHSS 199 will also be added.

Other Issues

There were no other issues for discussion.

V. Meetings

The next meeting will held on May 12, 2005 at 10:00 AM in the Breckenridge Room.

**EPA Comments on Draft Closeout Report for
IHSS Group NE-1
Ponds B-1, B-2, and B-3
April 25, 2005**

General Comments

1. Throughout the document (Executive Summary, body of the report, and in the Conclusions) it is stated that at the B-Ponds "subsurface soil is not subject to erosion" or the area has "low erosion potential." This assumption should be reconsidered since the nature of the B-Ponds is to retain and direct water from the site. This inherent purpose would suggest that it is in a high potential erosion area and the document should be revised accordingly.
2. Significant modifications during this project from the Final ER RSOP (e.g., increased soil excavation depths/volume) should be addressed in this report, including the on-going discussions and decisions that were made as a result of the site conditions. Correspondence and meeting notes should be referenced as to the decisions that were made during the project.

Specific Comments

1. **Page iv, Acronyms List.** Please check the acronyms list to reflect those actually used in the document and consistency with the RSOP (e.g., biological opinion should be added).
2. **Page 71, Section 5.0, Confirmation Sampling.** Please reference the proposed B Pond Confirmation Sampling contact record (12/29/04) contained in Appendix A. This section should summarize differences between proposed and actual sampling.
3. **Page 76, Section 10.0, Post-Accelerated Action Conditions.** The document states that backfilling and final grading is being conducted as part of another project (ponds reconfiguration - wetlands restoration) and has not been completed. Although that was stated in the original RSOP, the backfilling and final grading is associated with a major scope change due to increased excavation depths. Therefore, the final closeout report should be modified to include backfilling and regrading as components of the B Ponds project.
4. **Page 76, Section 13.0, NLR Sampling Locations.** States "NLR locations are removed from SWD". It was our understanding that the data is retained in SWD and marked NLR. Please clarify this in the revised report.

CDPHE Comments on NE-1 B-Ponds Closeout

Section 13, page 76 says NLR locations are removed from SWD. It was my understanding that the data is retained in SWD and marked NLR.

Section 15, page 97: revise last bullet saying area is not subject to significant erosion, any area in the drainage is subject to significant erosion.

Colorado Department of Public Health and Environment

Hazardous Materials & Waste Management Division

Comments

Draft

PAC REFERENCE NUMBER: OFF-SITE AREAS 1, 2, 3, & 4

Comprehensive

Historical Release Report

2005

General Comment:

- 1.** It is assumed, rightfully or wrongly, that the previous and current NFAA includes some recognition that future sediment removal actions, which may be necessary to dredge out these ponds/reservoirs, would incur possible DOE involvement and appropriate sediment management.

Specific Comments:

- 2.** **IHSS 199 – Contamination of the Land's Surface** – In the first paragraph, it may be desirable to note the future use of the site and that the WRW risks are much lower.
- 3.** Also, where it discusses the potential for radiological contamination coming from the solar ponds being "primarily uranium isotopes". This may be correct, but it should also be recognized that the exterior of Building 964, which is immediately east of the solar ponds, was contaminated above unrestricted release levels with transuranics that appear to have come from the solar ponds.
- 4.** **IHSS 200 – Great Western Reservoir** – In the third paragraph where "varying amounts in the sediments" is discussed, it may be desirable to note the cleanup performed on the B-Ponds as a safeguard against future contamination. This may apply to Standley Lake also.
- 5.** Page 5, 2nd para. – Please indicate the exposure pathway used relative to a hypothetical resident. If surface soil, it may be desirable to compare the the risk level to the WRW level.

Required Distribution:

M. Aguilar, USEPA
S. Bell, DOE-RFFO
J. Berardini, K-H
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M. Broussard, K-H RISS
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G. Carnival, K-H RISS
N. Castaneda, DOE-RFFO
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Additional Distribution:
